1	Fred W. Schwinn (SBN 225575) CONSUMER LAW CENTER, INC.		
2	12 South First Street, Suite 1014		
3	San Jose, California 95113-2418 Telephone Number: (408) 294-6100		
4	Facsimile Number: (408) 294-6190 Email Address: fred.schwinn@sjconsumerlaw.com		
5	Attorney for Plaintiff SAMUEL KWESI DADJO		
6	SAMULL KWESI DADJO		
7			
8	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
9			
10	SAMUEL KWESI DADJO,	Case No. C07-05856-SC	
11	Plaintiff,		
12	v.	PLAINTIFF'S NOTICE OF DISCOVERY PROPOUNDED TO	
13	ENCORE RECEIVABLE MANAGEMENT,	DEFENDANT, ENCORE RECEIVABLE MANAGEMENT, INC.	
14	INC., a Kansas Corporation,		
15	Defendant.		
16	COMES NOW the Plaintiff, SAMUEL KWESI DADJO, by and through his attorney, Fred		
17	W. Schwinn of the Consumer Law Center, Inc., and hereby notifies the Court that on the 20th day		
18	of February, 2008, Interrogatories numbered 1 through 25 inclusively, have been submitted for		
19	answer by Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in accordance with Rule		
20	33 of the Federal Rules of Civil Procedure, within thirty (30) days from the date of service thereof		
21	You will please take notice that the party filing these Interrogatories demands answers under		
22	oath in accordance with the rules of civil procedure. These Interrogatories are continuing and		
23	require supplemental answers if additional information is obtained between the time of answering		
24	and the time of trial.		
25	ADDITIONALLY, Plaintiff notifies the Court that he has also served a Request fo		
26	Production of Documents in accordance with Rule 34 of the Federal Rules of Civil Procedure		
27	containing 24 paragraphs upon Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., and		
28	that these discovery requests are to be responded to within thirty (30) days.		

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1	ADDITIONALLY, Plaintiff notifies the Court that he has also served a Request for		
2	Admissions in accordance with Rule 36 of the Federal Rules of Civil Procedure, containing 20		
3	paragraphs upon Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., and that these		
4	discovery requests are to be responded to within thirty (30) days.		
5	CONGLIMED LAW CENTED, INC.		
6	CONSUMER LAW CENTER, INC.		
7	By: /s/ Fred W. Schwinn		
8	Fred W. Schwinn (SBN 225575) 12 South First Street, Suite 1014 South First Street, South 2418		
9	San Jose, California 95113-2418 Telephone Number: (408) 294-6100		
10	Facsimile Number: (408) 294-6190 Email: fred.schwinn@sjconsumerlaw.com		
11	Attorney for Plaintiff		
12	<u>CERTIFICATE OF SERVICE</u>		
13	The undersigned, Fred W. Schwinn, does hereby certify that he caused a true and correct		
14	copy of the above and foregoing document to be deposited in the United States mail, postage		
15	prepaid, addressed to the following:		
16	David J. Kaminski Carlson & Messer, LLP		
17	5959 W. Century Boulevard, Suite 1214 Los Angeles, CA 90045		
18	Attorney for Defendant		
19	on this, the 20 th day of February, 2008. /s/ Fred W. Schwinn		
20	Fred W. Schwinn		
21			
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28	2		
	-2- NOTICE OF DISCOVERY PROPOUNDED TO DEFENDANT Case No. C07-05856-SC		